

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

VALENE REED, individually and on	)	
behalf of all others similarly situated,	)	Civil Action No. 10-cv-5642 (DLC)
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
CONTINENTAL GUEST SERVICES	)	Filed Electronically
CORPORATION,	)	
	)	
Defendant.	)	
	)	

**PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff, through her undersigned counsel, respectfully moves this Court for an Order preliminarily approving the terms of a proposed class action settlement; approving the form and method of providing notice of the settlement to the class; and scheduling a final hearing regarding the settlement. In support of this Motion, Plaintiff avers as follows:

1. After arms-length negotiations, the Parties have reached a proposed settlement of this putative class action. On or about February 11, 2011, the Parties executed a Class Action Settlement Agreement (“Settlement Agreement” or “Settlement”), a copy of which is attached hereto as Exhibit 1.

2. Consistent with the Memorandum of Law and Settlement Agreement filed herewith, Plaintiff respectfully requests that the Court sign the proposed Order preliminarily approving the terms of a proposed class action settlement; approving the form and method of providing notice of the settlement to the class; and scheduling a final hearing regarding the settlement.

WHEREFORE, Plaintiff hereby moves this Court for an Order (1) preliminarily approving the terms of the Settlement as set forth in the Settlement Agreement; (2) approving the form of notice and the method of providing notice of the Settlement to the Class as set forth in the Settlement Agreement, and directing that said form of notice be provided to Class Members in that manner; and (3) scheduling a Final Settlement Hearing at which the request for final approval of the proposed Settlement, Plaintiffs' Counsels' application for an award of attorneys' fees and costs, and for the entry of the Final Judgment and Order will be considered. A proposed Order Preliminarily Approving the Class Settlement, Directing the Issuance of Notice to the Class and Scheduling a Settlement Hearing is attached to the Settlement Agreement as Exhibit "A."

Respectfully Submitted,

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